

UNITED STATES OF AMERICA
DISTRICT OF NEW HAMPSHIRE

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	No. 09-Cr-30-02-GZS
)	
ELAINE BROWN)	
_____)	

UNOPPOSED MOTION ON FILING DEADLINE

Counsel for defendant Elaine Brown respectfully moves that he have until late on September 30, 2009 to file his sentencing motion in support of a guidelines departure and a non-guideline sentence of 360 months of imprisonment on the ground that he will not be able to examine pertinent firearms and their magazines, on which the government relies to enhance the defendant's advisory guidelines sentencing range per U.S.S.G. § 2K2.1(a)(4)(B), until the afternoon of September 30.

The government does not oppose the relief sought herein.

No memorandum accompanies this motion because it is unopposed.

WHEREFORE, it is respectfully moved that the Court grant such other and further relief as may be just.

Respectfully submitted,
ELAINE BROWN
By Her Attorney,

Date: September 28, 2009

/s/ Bjorn Lange
Bjorn Lange (NHBA: 1426)
Assistant Federal Public Defender
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CERTIFICATE OF SERVICE

I Bjorn Lange hereby certify that on September 28, 2009, a copy of the foregoing was sent via ECF to AUSA Terry L. Ollila, AUSA Arnold H. Huftalen, and Attorney Michael J. Iacopino and via e-mail to DCUSPO Cathy Battistelli.

/s/ Bjorn Lange